

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

**ASHLEY BOSHEA, as representative
of the ESTATE OF DAVID J. BOSHEA**

Plaintiff

v.

Case No.: 1:21-CV-00309-ELH

COMPASS MARKETING, INC.,

Defendant

**CONSENT MOTION FOR THIRD EXTENSION OF TIME
TO FILE ATTORNEYS' FEE PETITION AND BILL OF COSTS
TO AND INCLUDING JANUARY 12, 2026, AND A
RESPONSE TO AND INCLUDING FEBRUARY 2, 2026
(UNCONTESTED)**

Plaintiff, Ashley Boshea, as the representative of the Estate of David Boshea, respectfully moves for an order extending the time for Plaintiff to submit a Petition for Attorneys' Fees and Bill of Costs to and including January 12, 2025; and to extend the deadline for Defendant Compass Marketing to file a response to and including February 2, 2026.

The deadline for submitting the petition is currently Monday, December 29, 2025.

Upon further consideration, attorneys for both parties realized they need more time to fully address the issue of fees and costs and that their prior motion to extend the deadline to Monday, December 29, 2025, was unrealistic.

This extension will not prejudice either party.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and extend the deadline to file her petition on or before January 12, 2026; and for Defendant to file a response on or before February 2, 2026.

Respectfully submitted,

s/Thomas J. Gagliardo

Thomas J. Gagliardo

Of Counsel

Gilbert Employment Law, P.C.
8403 Colesville Road, Suite 1000
Silver Spring, Maryland 20910
301 608 0880 FAX 301 608 0881

ttagliardo@gelawyer.com

Gregory J. Jordan (Admitted Pro Hac Vice)
Jordan & Zito LLC
350 N. LaSalle Drive, Suite 700
Chicago IL 60654
(312) 854-7181
gjordan@jz-llc.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of above “Consent Motion for Extension of Time to File Attorneys’ Fee Petition and Bill of Costs to and including January 12, 2026” was served via this Court’s ECF system and by electronic mail the 27th day of December 2025:

Stephen B. Stern
Attorney for Defendant Compass Marketing
stern@kaganstern.com

/s/ Gregory J. Jordan